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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHELLE Y. HOOPER, an individual;
TIMOTHY W. HOOPER, an individual,

Plaintiffs,

v.

SPECIALIZED LOAN SERVICING, LLC, a
foreign limited-liability company,

Defendant.

Case No.: 2:18-cv-00542-APG-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND THE TIME FOR
DEFENDANT TO ANSWER**

(Third Request)

Plaintiffs Michelle Y. Hooper and Timothy W. Hooper (“Plaintiffs”), by and through their counsel of record, The Law Office of Kevin L. Hernandez, and Defendant Specialized Loan Servicing, LLC, (“SLS”), by and through its counsel of record, Greenberg Traurig, LLP, stipulate and request that the Court extend the time by which SLS must respond to the Complaint by fourteen (14) days up to, and including, **September 5, 2018**. This Stipulation is made and based upon the following:

1. Plaintiffs filed their Complaint on March 26, 2018, in which they allege SLS violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et. seq.* ECF No. 1.
2. An Amended Summons was issued on April 3, 2018. ECF No. 6.
3. The Amended Summons was returned executed on April 13, 2018. ECF No. 7. The Amended Summons was served on National Registered Agents, Inc., in Carson City, Nevada. *Id.*

4. National Registered Agents, Inc., is not SLS' registered agent. Rather, SLS' registered agent with the Nevada Secretary of State is the United Agent Group, Inc., located in Las Vegas, Nevada. Thus, SLS was not served with the Summons and Complaint.
5. Plaintiffs moved for a Clerk's entry of default on June 12, 2018 (ECF No. 8) which was granted the following day (ECF No. 9). Plaintiffs thereafter filed a Motion for Default Judgment on July 5, 2018. (ECF No. 10).
6. SLS became aware of this lawsuit and retained counsel. The Court granted the parties' stipulation to vacate the Clerk's entry of default, withdraw Plaintiffs' motion for default judgment, and extend the time for SLS to answer. ECF No. 12.
7. Counsel for Defendant has not had an adequate opportunity to investigate the Complaint's allegations or to consult with Defendant regarding an appropriate response, taking into account the exercise of due diligence.
8. In light of the foregoing, the parties agree that SLS shall have up to, and including, **September 5, 2018**, to respond to the Complaint.
9. This is the third and final stipulation for an extension of time. This Stipulation is entered into in good faith and not for purposes of delay.

DATED this 21st day of August, 2018.

DATED this 21st day of August, 2018.

/s/ Jacob Bundick

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JASON HICKS, ESQ.
Attorneys for Defendant

/s/ Kevin Hernandez

KEVIN L. HERNANDEZ, ESQ.
Attorneys for Plaintiffs

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: August 23, 2018